

# Governor Dave Heineman

STATE OF NEBRASKA

RECEIVED  
FEDERAL ELECTION  
COMMISSION

2010 NOV -8 AM 11:31

OFFICE OF GENERAL  
COUNSEL

November 2, 2010

Jeff S. Jordan  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

RE: MUR 6401

Dear Mr. Jordan:

In response to your letter dated October 27, 2010, the Governor Heineman Committee (the "Committee") writes to request that the Federal Election Commission (the "FEC") take no action with respect to the complaint filed against the Committee. The Committee, on September 30, 2010, was initially contacted by the Nebraska Accountability and Disclosure Commission (the "NADC") regarding the potential that a contributor to the Committee may not be a domestic entity. On that same day, the Committee reviewed the facts surrounding the multiple addresses of the contributor, returned the contribution to the local representative of the contributor via hand delivery, informed the NADC of the actions of the Committee, and committed to demonstrate the return of the contribution on the supplemental schedule to the public contribution and expenditure report of the Committee for the reporting period ended September 28, 2010.

Note that the contribution was drawn on a bank located in the United States, that the contributor maintains an Omaha, Nebraska address, and that the form documenting the contribution that was filed by the contributor demonstrates the Omaha, Nebraska address. The Committee understands that the contributor stated publicly its belief that the contribution is not inconsistent with the FEC rules.

Attached for your review is a copy of the September 30, 2010 letter on behalf of the Committee to the NADC, an excerpt from the NADC filing of the Committee for the period ended September 28, 2010, a copy of the contributor-filed contribution reporting form, a copy of the contribution check, and a copy of the contribution refund check.

Based upon the foregoing, the Committee believes that any potential violation of the FEC provisions was inadvertent and that any such violation was corrected in a prompt and transparent fashion. As a result, the Committee requests that the FEC take no further action with respect to this matter.

Very truly yours,  
Governor Heineman Committee

  
Bryan P. Robertson  
Treasurer

11044300108

**Schedule D - Section 2. Unpaid Bills and Other Accrued Expenses**

List all unpaid bills, accounts payable and other payments owed by the committee, i.e., accrued expenses for goods, materials, services or facilities received, for which payment has not been made as of the closing date of this statement. Include any amounts owed to the candidate if the candidate is to seek reimbursement from the committee. If the exact amount of an unpaid bill is unknown, report a reasonable estimate of the amount owed. ~~Loans are not to be reported in this Schedule. Loans are reportable in Section 1 of Schedule C.~~

**IMPORTANT:** Candidates for the Legislature and for other covered elective offices (under the CFLA) are reminded that for the purposes of determining if a candidate agreeing to abide by the spending limits has complied with the applicable limit, unpaid bills and accrued expenses are considered expenditures. Candidates for these offices who have not agreed to abide by these limits are reminded that for the purpose of determining if a candidate has exceeded the estimate of maximum expenditures on file with the Commission, unpaid bills and accrued expenses are considered expenditures.

**PROVIDE THE ITEMIZED INFORMATION BELOW FOR AMOUNTS KNOWN OR ESTIMATED TO EXCEED \$250.**

Date of Billing or Account Incurred	Name and Street Address or Rural Route of Creditor	Description of Goods, Services or Facilities Received	Amount Unpaid
10/01/2010	Trans Canada Keystone Pipeline 450 1 <sup>st</sup> Street SW Omaha, NE 68104	Refund of Contribution	2,500.00
<b>Total of Itemized Unpaid Bills and Other Accrued Expenses</b>			<b>\$0.00</b>
<b>Total of Unpaid Bills and Other Accrued Expenses of \$250 or Less</b>			<b>\$0.00</b>
<b>Total of All Unpaid Bills and Other Accrued Expenses</b>			<b>\$0.00</b>

(COMMITTEE NAME)

(DATE OF STATEMENT)

11044300109

Official Nebraska Government Website

11th Floor of the State Capitol  
P.O. Box 95086  
Lincoln, NE 68509  
(402) 471-2522

## Nebraska Accountability and Disclosure Commission

Campaign  
Finance

Lobbying

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Enforcement

Entity / Direct Contributions

Indirect Contributions / PAC Info

NEBRASKA  
ACCOUNTABILITY AND  
DISCLOSURE COMMISSION  
11th Floor, State Capitol  
P.O. Box 95086  
Lincoln, NE 68509  
(402) 471-2522

### REPORT OF POLITICAL CONTRIBUTIONS OF A CORPORATION, UNION OR OTHER ASSOCIATION

NADC FORM B-7

- Any corporation (including a non-profit or professional corporation), labor organization, or industry, trade, or professional association, doing business in this state which makes a contribution or expenditure or provides personal services of \$250.00 determined by fair market value for the purpose of influencing or attempting to influence the action of the voters for or against the nomination or election of one or more candidates or the qualification, passage or defeat of one or more ballot questions must file this form.
- File with the Nebraska Accountability and Disclosure Commission within 10 days after the end of the calendar month in which any reportable contribution or expenditure is made or personal service is provided.
- This report is filed on line if it is postmarked or received on or before the due date. Late filing fees are \$25.00 per day, not to exceed \$750.00.

ITEM 1 NAME, STREET ADDRESS AND NATURE OF CORPORATION, UNION OR OTHER ASSOCIATION

☒ Corporation ☐ Labor Organization ☐ Industry or Trade Association ☐ Professional Association

Name CRANE CANADA CORPORATION

Telephone No.

Address 13770 FIFTH AVENUE 1310 OMAHA, NE 68154

ITEM 2 DIRECT CONTRIBUTIONS TO CANDIDATES OR POLITICAL COMMITTEES (Complete for all cash contributions and expenditures, pledges and loans of \$250 or more made directly to candidates or political committees.)

DATE	AMOUNT	RECIPIENT (Name of Candidate or Political Committee)
01/20/2010	2500.00	GOVERNOR HEINEMAN COMMITTEE

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